

Before the
Federal Communications Commission
Washington D.C. 20554

In the matter of:

Comments on the request for expedited)	
review of E-Rate application and SPIN)	
change by the state of Tennessee)	DA 03-1186
)	
Federal-State Joint Board on)	
Universal Service)	CC Docket No. 96-45
)	CC Docket No. 97-21

Comments of the CCSO E-Rate Alliance

The Wireline Competition Bureau requests comment on a Petition by the state of Tennessee to allow it to change service providers for Universal Service, E-Rate discounts prior to issuance of a Funding Commitment Decision Letter (FCDL). Current Schools and Libraries Division (SLD) procedures do not allow applicants to request service provider changes before a FCDL has been issued. In accordance with Commission regulation, the Council of Chief State School Officers E-Rate Alliance is pleased to submit these comments.

To comply with E-Rate procurement regulations, applicants are required to enter into “legally binding agreements” with vendors at least five months prior to the funding year. Many applicants, particularly large applicants and large funding requests must pass several layers of application review by SLD. These reviews can extend well into the funding year, effectively denying applicants the opportunity to change service providers long after service was supposed to have begun.

We support a policy allowing SPIN changes prior to issuance of a FCDL if the application in question has been successfully data entered, has been subject to PIA review, and more than 60 days has passed with no additional communication from SLD regarding the application in question. We recognize additional restrictions apply to SPIN change requests but decline to address those issues here.

Respectfully submitted this 30th day of April, 2003

Council of Chief States School Officers E-Rate Alliance